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13 *Toshiba America, Inc.,*

14 *Toshiba America Consumer Products, LLC,*

15 *Toshiba America Information Systems, Inc.,*

16 *and Toshiba America Electronic Components, Inc.*

17 UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA
19 (SAN FRANCISCO DIVISION)

20 IN RE: CATHODE RAY TUBE (CRT)
21 ANTITRUST LITIGATION

22 Case No. 07-5944 SC
23 MDL No. 1917

24 This Document Relates to:

25 *Best Buy Co., Inc., et al. v. Hitachi, Ltd., et al.,*
26 Case No. 3:11-cv-05513

27 *Best Buy Co., Inc., et al. v. Technicolor SA, et*
28 *al., Case No. 13-cv-05264*

CompuCom Systems, Inc. v. Hitachi, Ltd., et
al., Case No. 3:11-cv-06396

Costco Wholesale Corp. v. Hitachi, Ltd., et
al., Case No. 3:11-cv-06397

Dell Inc., et al. v. Hitachi, Ltd., et al., Case
No. 13-cv-02171

**DECLARATION OF LUCIUS B. LAU
IN SUPPORT OF DEFENDANTS'
ADMINISTRATIVE MOTION TO
FILE DOCUMENTS UNDER SEAL
PURSUANT TO CIVIL LOCAL
RULES 7-11 AND 79-5(d)**

DECLARATION OF LUCIUS B. LAU IN SUPPORT OF DEFENDANTS' ADMINISTRATIVE MOTION
TO FILE DOCUMENTS UNDER SEAL PURSUANT TO CIVIL LOCAL RULES 7-11 AND 79-5(d)

Case No. 07-5944 SC
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Electrograph Systems, Inc., et al. v. Hitachi, Ltd., et al., Case No. 3:11-cv-01656

Electrograph Systems, Inc., et al. v. Technicolor SA, et al., Case No. 3:13-cv-05724

Interbond Corp. of America v. Hitachi, Ltd., et al., Case No. 3:11-cv-06275

Interbond Corp. of America v. Technicolor SA, et al., Case No. 3:13-cv-05727

Office Depot, Inc. v. Hitachi, Ltd., et al., Case No. 3:11-cv-06276

Office Depot, Inc. v. Technicolor SA, et al., Case No. 3:13-cv-05726

P.C. Richard & Son Long Island Corp., et al. v. Hitachi, Ltd., et al., Case No. 3:12-cv-02648

P.C. Richard & Son Long Island Corp., et al. v. Technicolor SA, et al., Case No. 3:13-cv-05725

Sears, Roebuck & Co. and Kmart Corp. v. Chunghwa Picture Tubes, Ltd., et al., Case No. 3:11-cv-05514

Tech Data Corp., et al. v. Hitachi, Ltd., et al., Case No. 3:13-cv-00157

Viewsonic Corporation v. Chunghwa Picture Tubes, Ltd., et al., Case No. 3:14-cv-002510

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1 I, Lucius B. Lau, hereby declare as follows:

2 1. I am an attorney with the law firm of White & Case LLP, attorneys for
3 Defendants Toshiba Corporation, Toshiba America, Inc., Toshiba America Information
4 Systems, Inc., Toshiba America Consumer Products, LLC, and Toshiba America Electronic
5 Components, Inc. (collectively, the “Toshiba Defendants”). I make this declaration in
6 support of Defendants’ Administrative Motion to File Documents Under Seal Pursuant to
7 Civil Local Rules 7-11 and 79-5(d) (the “Motion to Seal”).

8 2. Except for those matters stated on information and belief, which I believe to be
9 true, I have personal knowledge of the facts set forth herein and, if called upon, could and
10 would competently testify thereto under oath.

11 3. On June 18, 2008, the Court approved a Stipulated Protective Order (Dkt. No.
12 306) (“Protective Order”) in this matter.

13 4. The Toshiba Defendants and other parties to this litigation have produced in
14 this action certain documents and information designated as either “Confidential” or “Highly
15 Confidential” pursuant to the Stipulated Protective Order.

16 5. On February 9, 2015, Defendants filed an administrative motion to seal the
17 following document, pursuant to Civil Local Rules 7-11 and 79-5(d): Designated portions of
18 the Reply Memorandum in Support of Motion to Exclude Certain Expert Testimony of
19 Professor Kenneth Elzinga.

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6. Pursuant to Civil Local Rules 7-11 and 79-5(d), this Court's General Order No. 62, Electronic Filing of Documents Under Seal, effective May 10, 2010, and the Protective Order, the designated portions of the Reply Memorandum in Support of Motion to Exclude Certain Expert Testimony of Professor Kenneth Elzinga and Exhibit A to the Declaration of Lucius B. Lau, dated February 9, 2015 attached thereto should be maintained under seal.

Executed this 9th day of February, 2015, in Washington, D.C.

CERTIFICATE OF SERVICE

On February 9, 2015, I caused a copy of “DECLARATION OF LUCIUS B. LAU IN SUPPORT OF DEFENDANTS’ ADMINISTRATIVE MOTION TO FILE DOCUMENTS UNDER SEAL PURSUANT TO CIVIL LOCAL RULES 7-11 AND 79-5(d)” to be electronically filed via the Court’s Electronic Case Filing System, which constitutes service in this action pursuant to the Court’s order of September 29, 2008.

/s/ Lucius B. Lau

Lucius B. Lau

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